	08-13555-mg Doc 12781-1 Filed 11/15/10 En Fourth Amended Complaint in State	
1 2	LAW OFFICES OF ZAMOS & OKOJIE Jerome Zamos, SB 36246 Odion L. Okojie, SB 164931	CONFORMED COPY OF ORIGINAL FILED Los Angeles Superior Court
3	880 West First Street, Suite #313 Los Angeles, California 90012	MAR 24 2009
4 5	Telephone: (818) 348-7151/(213) 626-Facsimile: (818) 348-6095/(213) 626-Email: zamoslaw@aol.com	4100 690 John A. Claska, Exagutive Officar/Olerk By Bebuty
6	Email: <u>zamoslaw@aol.com</u>	BORDTRY SWAIN
7	Attorneys for PLAINTIFF PRUDENCE WAL	ΓZ
8	SUPERIOR COURT OF THE ST.	ATE OF CALIFORNIA
9	FOR THE COUNTY OF I	OS ANGELES
10	CENTRAL [UNLIMITED JURIS	DICTION] DISTRICT
11	PRUDENCE WALTZ,	BC374163) Case No.: ፷፪20492207
12	PLAINTIFF	Assigned to Department 47
13	V.	THE HON. AUERLIO MUNOZ
14	BLUE OCEAN MORTGAGE CORPORATION, a California Corporation, MATTHEW P.	FOURTH AMENDED COMPLAINT FOR CANCELLATION AND RESCISSION OF A FRAUDULENTLY CREATED DEED, RETURN
15 16	KAY an individual, MOHAMED FOUZI HAFFAR an individual, LATOSHIA KELLER, an individual AURORA LOAN) OF REAL PROPERTY AND DAMAGES FOR) WRONGFUL TAKING AND RETENTION OF REAL PROPERTY
17	SERVICES and DOES 1 THROUGH 20 inclusive) [CC §§ 1695.7, 1712, 2945.6, 3281 and 3412]
18	Defendants	
19	COMES NOW PLAINTIFF PRUDENCE WAI	TZ [hereinafter referred to as
20	"PLAINTIFF"] for her causes of action	against DEFENDANTS and each
21	them alleges as follows:	
22	PLAINTI	?F
23	1. PLAINTIFF PRUDENCE WALTZ is	now and was at all times herein
24	mentioned a resident of the County of	Los Angeles, State of California
25	and the owner and entitled to possessi	on of that certain real property
26	located at and commonly known as 844 West 57th Street, Los Angeles,	
27	California 90037-3628 [Los Angeles Co	unty Assessor's Parcel No. 5001-
28	014-01 which is hereinafter referred	to as "THE SUBJECT PROPERTY"]

which is more fully described as follows:

The North 113.25 feet of Lot 382 or Burck's Golden Tract, in the City of Los Angeles, County of Los Angeles as per map recorded in Book 10, Page 26 of Maps in the

office of the County Records of said County.

- 2. PLAINTIFF is informed, and based on such information believes that as a result of the fraudulent and unauthorized placement of a forged signature [which is purported to be hers] on a grant deed [a copy of which is attached hereto as Exhibit "1" and hereinafter referred to as "THE FRAUDULENT DEED"] by agents of BLUE OCEAN MORTGAGE CORPORATION, a California Corporation [hereinafter referred to as "BLUE OCEAN"], MATTHEW P. KAY and MOHAMED FOUZI HAFFAR on January 18, 2006 she was illegally and improperly deprived of the right to retain, enjoy and maintain possession of THE SUBJECT PROPERTY.
- 3. PLAINTIFF did not and never has executed either THE FRAUDULENT DEED or any other instrument conveying her interest in THE SUBJECT PROPERTY to either SAMANTHA HILL or anyone else.

DEFENDANTS

4. PLAINTIFF is informed and based upon such information believes that DEFENDANT BLUE OCEAN MORTGAGE CORPORATION, INC. [hereinafter referred to as "BLUE OCEAN"] was at time THE FRAUDULENT DEED was created and recorded by its agents a California corporation holding a broker's license issued by THE CALIFORNIA DEPARTMENT OF REAL ESTATE [hereinafter referred to as "THE DRE"] whose corporate powers and license to engage in either the real estate or any other business within the State of California has been suspended by the California Secretary of State and Department of Real Estate.

- 5. PLAINTIFF is informed and based upon such information believes that DEFENDANT AURORA LOAN SERVICES, INC. is a DELAWARE CORPORATION which has surrendered its authority to do business in the State of California but claims an interest in THE SUBJECT PROPERTY as a result a deed from a party whose title was derived and dependent upon the validity of THE FRAUDULENT DEED referred to herein.
- 6. PLAINTIFF is informed and based upon such information believes that at the time individual DEFENDANTS MATTHEW P. KAY, MOHAMAD FOUZI HAFFAR and LATOSHIA KELLER participated in and encouraged the creation of THE FRAUDULENT DEED they were either residents of or conducting in the County of Los Angeles, State of California.
- 7. PLAINTIFF is informed, and based on such information believes that during the period prior to individual DEFENDANTS MATTHEW P. KAY'S, MOHAMAD FOUZI HAFFAR decision to withdraw from further involvement with BLUE OCEAN, they operated and controlled the under-capitalized entity as their alter ego for the personal benefit and without regard to the entity's obligations [both fiduciary and otherwise] to look out for and protect the financial interests of PLAINTIFF and other persons to whom they owed both a corporate and individual obligation as fiduciaries.
- 8. PLAINTIFF is informed, and based on such information believes that at the time THE FRAUDULENT DEED was created BLUE OCEAN held a license which was subject to provisions of the California Business and Professions Code § 10159.2(a) and regulations issued by DRE under which its responsible managing officer [INDIVIDUAL DEFENDANT MOHAMAD FOUZI HAFFAR] was and continues to be personally liable and responsible for all of it's and its agents' actions.

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- 9. PLAINTIFF is ignorant of the true names and capacities of DEFENDANTS sued herein as DOES 1 through 20, inclusive, and therefore sues these DEFENDANTS by such fictitious names. PLAINTIFF will pray leave of this court to amend this complaint to allege their true names and capacities when ascertained.
- 10. PLAINTIFF is informed and based upon such information believes that each of the individual and organizational defendants named herein [including DOES 1 through 20 inclusive] is either a resident or actively engaged in real estate related businesses within the County of Los Angeles, State of California.
- 11. PLAINTIFF is informed, and based upon such information, believes that the business entities and INDIVIDUAL DEFENDANTS whose identities are presently unknown are either residents of or conducting business out of which PLAINTIFF'S claims arose within the County of Los Angeles, State of California and are related to the remaining defendants in a partnership, agency, joint venture, supervisorial, and management capacity.
- 12. All of the individual defendants mentioned above, [including but not limited to DOES 1 through 20 inclusive] have acted in directorial, supervisorial, and managerial capacities in connection with the corporate defendants' real estate related businesses within the County of Los Angeles.
- 13. PLAINTIFF is informed and based upon such information believes that each of THE DEFENDANTS named herein was, at all times relevant to this action either the agent, employee, representing partner, or joint venturer of the remaining DEFENDANTS and acted within the scope of that relationship.

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14. PLAINTIFF is further informed and believes that each of THE DEFENDANTS herein gave consent to, ratified, and authorized the acts alleged herein as to each of the remaining DEFENDANTS.

FIRST CAUSE OF ACTION AGAINST ALL DEFENDANTS FOR THE CANCELLATION OF FRAUDULENT DEED AND RESTITUTION OF REAL PROPERTY [Civil Code §§ 1695.7, 1712, 2945.6 & 3412]

- 15. PLAINTIFF realleges and incorporates by reference every allegation contained in the preceding paragraphs 1 through 14 inclusive of this Complaint as though fully set forth herein.
- 16. As set forth above, notwithstanding PLAINTIFF'S status as the sole owner of THE SUBJECT PROPERTY at the time THE FRAUDULENT DEED was created DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER DOES 1 THROUGH 20 inclusive caused the deed to recorded without her knowledge or consent in order to transfer title to the property to one or more third parties.
- 17. PLAINTIFF has never knowingly executed any instrument [written or otherwise] conveying her interest in THE SUBJECT PROPERTY.
- 18. The signature on THE FRAUDULENT DEED is not PLAINTIFF'S and was not placed on that or any other deed at her direction.
- 19. PLAINTIFF is informed, and based on such information believes that because she never knowingly executed THE FRAUDULENT DEED or any other instrument conveying her interest in THE SUBJECT PROPERTY to anyone, including any of the defendants named in this action or their predecessors in title, she remains the owner in fee of said property and entitled to have possession restored to her pursuant to Civil Code § 1712 by whoever is currently in possession and claiming ownership and any other possessory interest therein.

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20. PLAINTIFF realleges and incorporates by reference every allegation contained in the preceding paragraphs 1 through inclusive of this Complaint as though fully set forth herein.

SECOND CAUSE OF ACTION FOR DAMAGES UNDER CIVIL CODE § 3281
AS A RESULT OF THE DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER DOES 1 THROUGH 20 inclusive THEIR AGENTS, ATTORNEYS, SERVANTS AND EMPLOYEES FRAUDULENT INTERFERENCE WITH PLAINTIFF'S ENJOYMENT AND POSSESSION OF THE SUBJECT PROPERTY AND BREACH OF THE CALLEDNIA DEPARTMENT OF DEAL ESTATE

THE CALIFORNIA DEPARTMENT OF REAL ESTATE

- PLAINTIFF is informed and based upon such information 21. believes that DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR and DOES 1 THROUGH 20 inclusive as holders of licenses issued by THE DRE were personally liable for all actions related to the conduct of their real estate business and were at all times bound as fiduciaries to act honestly and in good faith during the course of all business dealings with PLAINTIFF relating to THE SUBJECT PROPERTY.
- PLAINTIFF is informed, and based on such information 22. believes that individual DEFENDANT LATOSHIA KELLER knowingly aided and abetted DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR and DOES 1 THROUGH 20 inclusive in the creation of THE FRAUDULENT DEED by wrongfully notarizing the instrument in order to facilitate its wrongful and improper recordation in the official records of Los Angeles County California.
- PLAINTIFF is informed and based upon such information 23. believes that instead of acting in a manner consistent with their fiduciary duties as holders of licenses issued by THE DRE DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR and DOES 1 THROUGH 20 inclusive engaged in a course of action which they knew, or should have known would result in her loss of her equity in and her ability to enjoy the benefits of continuing ownership of THE SUBJECT PROPERTY.

- 24. DEFENDANTS BLUE OCEAN'S, MATTHEW P. KAY'S, MOHAMED FOUZI HAFFAR'S, LATOSHIA KELLER'S and DOES 1 THROUGH 20 inclusive's wrongful actions included, but are not limited to the fraudulent placement and notarization of a forged signature on and the recordation of THE FRAUDULENT DEED as part of a scheme to use THE SUBJECT PROPERTY as collateral for a series of unauthorized loan transactions in order to generate undisclosed profits and commissions in violation of Civil Code § 2945.4.
- 25. The actions of DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER and DOES 1 THROUGH 20 inclusive described in this complaint and referred to herein did in fact result in PLAINTIFF'S loss of rents and profits following her exclusion from THE SUBJECT PROPERTY in an amount to be established by evidence to be submitted and determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California.
- 26. In addition to the foregoing PLAINTIFF has incurred special damages in the form of attorney fees incurred in the prosecution of an action to recover possession and title to THE SUBJECT PROPERTY.
- 27. As a result of the foregoing PLAINTIFF has suffered general damages in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS AND NO CENTS [\$25,000.00] to be determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California.
- 28. In addition to the general damages described above PLAINTIFF has also suffered shock and injury to her nervous system which has resulted in severe mental anguish justifying an additional award of damages in such sum as a jury empaneled in this action in a manner

consistent with the provisions of Article I § 16 of the Constitution of the State of California and the Seventh Amendment to the Constitution of the United States of America may deem appropriate.

29. The actions taken by DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER and DOES 1 THROUGH 20 inclusive and their agents, including the creation of THE FRAUDULENT DEED through placement of a forged signature on the document and their use of THE SUBJECT PROPERTY as collateral for loans obtained for the benefit of unaffiliated third parties were malicious and pursued in a reckless and irresponsible manner with complete indifference for the impact such actions might have on PLAINTIFF and her right to enjoy the benefits associated with the continued ownership of THE SUBJECT PROPERTY, thereby justifying an award of punitive damages in such sum as a jury empaneled in this action in a manner consistent with the provisions of Article I § 16 of the Constitution of the State of California.

THIRD CAUSE OF ACTION FOR DAMAGES UNDER CIVIL CODE § 1695.7
AS A RESULT OF THE DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR AND DOES 1 THROUGH 20 INCLUSIVE THEIR AGENTS, ATTORNEYS, SERVANTS AND EMPLOYEES BASED ON THEIR VIOLATIONS OF CIVIL CODE §§ 1695.1 ET SEQ.

- 30. PLAINTIFF realleges and incorporates by reference every allegation contained in the preceding paragraphs 1 through 29 inclusive of this Complaint as though fully set forth herein.
- 31. PLAINTIFF is informed, and based upon such information believes that the actions of DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR AND DOES 1 THROUGH 20 and their agents described and referred to herein violated and did not comply with the provisions of Civil Code §§ 1695.1 et seq.

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- 32. As a result of the facts set forth herein under the provisions of Civil Code §§ 1695.7 PLAINTIFF is entitled to recover her actual damages plus reasonable attorneys' fees and costs plus exemplary damages in an amount not less than three times the value of the equity she lost in THE SUBJECT PROPERTY as a result of DEFENDANTS' actions.
- 33. As a result of DEFENDANTS BLUE OCEAN'S, MATTHEW P. KAY'S, MOHAMED FOUZI HAFFAR'S and DOES 1 THROUGH 20 inclusive violation of Civil Code §§ 1695. 1 et seq. PLAINTIFF lost rents and profits in an amount to be established by evidence to be submitted and determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California.
- 34. As a result further result of DEFENDANTS BLUE OCEAN'S, MATTHEW P. KAY'S, MOHAMED FOUZI HAFFAR'S and DOES 1 THROUGH 20 inclusive violation of Civil Code §§ 1695. 1 et seq. PLAINTIFF has suffered general damages in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS AND NO CENTS [\$25,000.00] to be determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California.
- 35. In addition to the general damages described above PLAINTIFF has also suffered shock and injury to her nervous system which has resulted in severe mental anguish justifying an additional award of damages in such sum as a jury empaneled in this action in a manner consistent with the provisions of Article I § 16 of the Constitution of the State of California and the Seventh Amendment to the Constitution of the United States of America may deem appropriate.

36. DEFENDANTS BLUE OCEAN'S, MATTHEW P. KAY'S, MOHAMED FOUZI

1 HAFFAR'S and DOES 1 THROUGH 20 inclusive violation of Civil Code §§ 2 3 4 5 6 7 8 9

1695. 1 et seq. were malicious and pursued in a reckless and irresponsible manner with complete indifference for the impact such actions might have on PLAINTIFF and her right to enjoy the benefits associated with the continued ownership of THE SUBJECT PROPERTY, thereby justifying an additional award of punitive damages in such sum as a jury empaneled in this action in a manner consistent with the provisions of Article I § 16 of the Constitution of the State of California. 10

FOURTH CAUSE OF ACTION FOR DAMAGES UNDER CIVIL CODE § 2945.6 AS A RESULT OF THE DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR AND DOES 1 THROUGH 20 INCLUSIVE THEIR AGENTS, ATTORNEYS, SERVANTS AND EMPLOYEES BASED ON THEIR VIOLATIONS OF CIVIL CODE §§ 2945 ET SEQ.

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37. PLAINTIFF realleges and incorporates by reference every allegation contained in the preceding paragraphs 1 through 36 inclusive of this Complaint as though fully set forth herein.

PLAINTIFF is informed, and based on such information

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believe that as a result of DEFENDANTS BLUE OCEAN'S, MATTHEW P. KAY'S, MOHAMED FOUZI HAFFAR'S AND DOES 1 THROUGH 20 INCLUSIVE'S violation of Civil Code § 2945(g) they received compensation from

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third parties related to their disposition of THE SUBJECT PROPERTY. 39. As a result of the facts set forth herein under the

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provisions of Civil Code §§ 2945.6(a) PLAINTIFF is entitled to

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exemplary damages in an amount of not less than three [3] times the

compensation DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI

recover her actual damages, reasonable attorneys' fees and costs plus

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HAFFAR'S AND DOES 1 THROUGH 20 INCLUSIVE received from third parties

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as a result of transaction facilitated in whole or part by the

creation and recordation of THE FRAUDULENT DEED.

WHEREFORE PLAINTIFF prays this Court enter judgment as follows:

- 1. Canceling, rescinding and declaring THE FRAUDULENT DEED [a copy of which is attached hereto as Exhibit "1"] which was recorded as instrument no. 06-0203073 in the official records of Los Angeles County, California on January 27, 2006 to be null and void and unenforceable pursuant to Civil Code § 3412.
- 2. Directing any DEFENDANT named herein or any other person, firm or business entity which currently has possession of or comes into possession of THE SUBJECT REAL PROPERTY during the course of this litigation to immediately return full possession and control of THE SUBJECT PROPERTY to PLAINTIFF pursuant to Civil Code § 1712.
- 3. Declaring that any title which passed to any DEFENDANT named in this action, or of any other person who acquired title after the recordation of THE FRAUDULENT DEED as instrument no. 06-0203073 in the official records of Los Angeles County, California on January 27, 2006 to be null and void.
- 4. Directing DEFENDANTS and any other person who acquired title to THE SUBJECT PROPERTY after the recordation of THE FRAUDULENT DEED, their agents, servants, employees and all other parties acting in concert with them to account for and turn over to PLAINTIFF all rents and profits which have accrued or have been collected by them.
- 5. Enjoining and restraining DEFENDANTS and any other person who acquired title after the recordation of THE FRAUDULENT DEED, their agents, servants, employees and all other parties acting in concert with them from interfering with PLAINTIFF'S right to full benefits of ownership and possession of THE SUBJECT REAL PROPERTY.

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- 7. For special damages against DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER and DOES 1 THROUGH 20 inclusive in an amount equal to the loss of rents and profits in an amount to be established by evidence to be submitted and determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California;
- 8. For special damages DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER and DOES 1 THROUGH 20 inclusive in an amount equal to the attorney fees incurred in recovering title to and possession of THE SUBJECT PROPERTY in an amount to be established by evidence to be submitted and determined by a jury empaneled in this action in a manner consistent with Article I § 16 of the Constitution of the State of California;
- 9. For exemplary damages in an amount not less than three [3] times the value of the equity which the evidence presented to the trier of fact determines PLAINTIFF lost in THE SUBJECT PROPERTY as a result of DEFENDANTS' violation of Civil Code §§ 1695.1 et seq.
- 10. For exemplary damages in an amount not less than three [3] times the compensation DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR'S AND DOES 1 THROUGH 20 INCLUSIVE received by from any third party as a result of any transaction facilitated in whole or part by the creation and recordation of THE FRAUDULENT DEED.

11. For punitive damages against DEFENDANTS BLUE OCEAN, MATTHEW P. KAY, MOHAMED FOUZI HAFFAR, LATOSHIA KELLER and DOES 1 THROUGH 20 inclusive in an amount which a jury empaneled under the provisions of Article I § 16 of the Constitution of the State of California and the Seventh Amendment to the Constitution of the United States of America may deem appropriate;

- 12. For cost of suit incurred herein including reasonable attorney fees under Civil Code §§ 1695.7 and 2945.6; and
 - 13. Such other and further relief as the court deems proper.

By:

JEROME ZAMOS, Attorneys for PLAINFIFF PRUDENCE WALTZ

EXHIBIT "1" TO FOURTH AMENDED COMPLAINT

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06 0203073

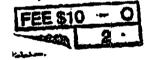
RECORDED/FILED IN OFFICIAL RECORDS
RECORDER'S OFFICE
LOS ANGELES COUNTY
CALIFORNIA
01/27/06 AT 08:00am

TITLE(S):

DEED



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CODE 20

CODE 19

CODE

Assessor's identification Number (AIN)
To be completed by Examiner OR Title Company in black ink.

Number of AIN's Shown

5601.014.011

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THIS FORM IS NOT TO BE DUPLICATED

Description: Los Angeles, CA Document-Year. DocID 2006, 203073 Page: 1 of 3 Order: 57th Comment:

;	707 13:26 FAX 628628393781-1 Filed 11/1 D8-13555-mg - Boc 12781-1 Filed 11/1 2007 11:27 Fourth Africaded Complain	1127/08
	RECORDING REQUESTED BY Financial This Company AND WHEN RECORDED MAIL TO Them Seventhe Hill Binet 844 - 846 U. 57 1455 City State 19 A 15065 C4, 9UC) 7 City State 19 A 15065 C4, 9UC) 7 City State 19 A 1506954 TRE-PE1	06 020307
;		SPACE ABOVE THIS LINE FOR RECORDER 4 USE T DEED
;	THE UNDERSIGNED GRUNTOR(s) DECLARE(s) City of Las Angeles City Conveyance Tax is 8 Percel No. 8001-014-011	Documentary Transfer Tex is \$550.00 Di computed on full value of interest
	FOR A VALUABLE CONSIDERATION, receipt of Prudence M. Waltz, a single woman hereby GRANT(s) to Samentha Hill, An UnMarried Woman the following real property:	· · · · · · · · · · · · · · · · · · ·
	Prudence M. Waltz, a single woman hereby GRANT(s) to Samenthe Hill, An UnMarried Woman	f which is hereby acknowledged,
	Prudence M. Waltz, a single woman hereby GRANT(s) to Samentha Hill, An UnMarried Woman the following real property:	f which is hereby acknowledged,
	Prudance M. Waltz, a single woman hereby GRANT(a) to Samentha Hill, An UnMarried Woman the following real property: See Exhibit A strached hereto and made a part her Dated: January 18, 2006 STATE OF CALIFORNIA COUNTY OF LOS ANGELES 3 8,8.	f which is hereby acknowledged, reof. Peudon M Wolfz
	Prudence M. Waltz, a single woman hereby GRANT(s) to Sementha Hill, An UnMarried Woman the following real property: See Exhibit A strached hereto and reads a part here Dated: January 18, 2005 attate of culpornia county of Los Angeles 1 8.8. Co Lanuary 18, 2006 bette ma.	Prudence M. Waltz
	Prudence M. Waltz, a single woman hereby GRANT(a) to Samentha Hill, An UnMarried Woman the following real property: See Exhibit A stached hereto and made a part here Dated: January 18, 2006 STATE OF CULPORNIA COUNTY OF LOS Angeles) 8,8. On January 18, 2006 before ma, Laloshia. Chante Kreller E Newsy Branco in and for said County and State, personelly appear	Prudence M. Waltz Prudence M. Waltz Prudence M. Waltz Commission # 1517959 Notary Public - Collisinia Los Angeles County My Comm. Sepires Oct 4, 2008

Description: Los Angeles, CA Document-Year. DocID 2006. 203079 Page: 2 of 3 Order: 57th Comment:

10/12/07 13:26 FAX 6266283938 OCT 12 200713555-mg Poc 12/781-1 , Filed 11/15/10 , Entered 11/15/10 18:27:26 Exhibit 14 Fourth Amended Complaint in State Court Pg 17 of 18 482

45046934 -585 -PE1

Exhib+A

, County of Los Angeles, State of

All that certain real property situated in the California, described as follows:

The North 113.25 Feet of Lot 382 of Burck's Golden Tract, in the City of Los Angeles, County of Los Angeles, California as per map recorded in Book 10, Page 26, of Maps in the Office of the County Records of said County

5001-014-011

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Description: Les Angeles,CA Document-Year.DocID 2006.203073 Page: 3 of 3 Order: 57th Comment:

08-13555-mg Doc 12781-1 Filed 11/15/10 Entered 11/15/10 18:27:26 Exhibit Fourth Amended Complaint in State Court Pg 18 of 18 PROOF OF SERVICE BY MAIL STATE OF CALIFORNIA, COUNTY OF LOS ANGELES I am employed in the County of LOS ANGELES, State of CALIFORNIA.

I am over the age of 18 and not a party to the within action; my

business address is 5228 Campo Road, Woodland Hills, California

On March 23, 2009 I served the following document(s) described as **FOURTH AMENDED COMPLAINT** on the interested parties in this by placing a true copy thereof enclosed in a sealed envelope with postage fully

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91364.

prepaid addressed to:

Daniel I Singer, Esquire

Cheryl Ziegler, Esquire

LOS ANGELES, CA 90036

3694 Midway Drive, Suite B

San Diego, California 92110

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MOHAMED FOUZI HAFFER, Esquire HAFFER & ASSOCIATES 402 West Broadway, Suite 400 San Diego, California 92101

BLUE OCEAN MORTGAGE, INC.
c/o MATTHEW P KAY [its agent for service] AURORA LOAN SERVICES, INC.
5900 WILSHIRE BLVD STE 2555 601 5th Avenue

Scottsbluff, Nebreska 69361

MATTHEW P KAY 1843 Cherokee Avenue, Apartment # 116 LOS ANGELES, CA 90028

LAW OFFICES OF SINGER & VENTURA, LLP

I am "readily familiar" with the firms practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Woodland Hills, California. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in set forth in this affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed March 23, 2000 at Woodland Hills, CALIFORNIA.

JEROME ZAMOS